UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS CIVIL ACTION NO:

BHARANIDHARAN PADMANABHAN MD PhD (Dr Bharani) - PLAINTIFF vs. ROBERT SWEENEY - DEFENDANT	))))))))	SWORN COMPLAINT JURY TRIAL DEMANDED

EXHIBIT 7

scleroplex inc.

Bharani Padmanabhan MD PhD
Multiple Sclerosis Neurologist
30 Gardner Rd. Suite 6A, Brookline MA 02445
+1 617 566 6047 phone + fax
scleroplex@gmail.com

6 October 2016

Re: 93A demand letter

Dear Attorneys Meyerson and Franklin,

Greetings!

I write in regards to your client Mr Robert Sweeney. As you know, on February 12, 2015, Mr Sweeney agreed to serve 16 summonses and complaints and charged me fees upfront.

Today the City Manager's Office for the City of Cambridge informed me that Mr Sweeney was not sworn in as a Constable for the years 2012 through 2016 and had no Constable Surety Bond on file with the City of Cambridge for that same period.

What this means is that in February 2015 when your client held out to me and to the general public that he is a licensed Constable running a regular store-front business in Cambridge, MA, called "Constable Services" that took in summonses and capiases to be served on behalf of clients, he was criminally impersonating a law enforcement officer and committing a conscious fraud on the clients as well as on the judicial system of this Commonwealth.

What this means is Mr Sweeney, at a minimum, committed a Crime against Public Justice, G.L.c. 268, § 33, a crime punishable with "imprisonment for not more than one year."

This is fraud on a massive scale that is even larger than that of the EMTs who bribed their way to renewal of their licenses.

This is fraud on the level of Annie Dookhan as it means that every single summons and complaint taken in and served by Mr Sweeney was improper and ineffective.

In our meeting yesterday, Mr Meyerson, you informed me that your firm had hired Mr Sweeney to serve hundreds of complaints and other court documents over many years. Every single one of those was improperly and illegally served.

Pursuant to the SJC's Rules of Professional Conduct, now that you have been informed of this fact, it is mandatory that you inform all parties affected by this in all of the cases where you had Mr Sweeney serve papers.

It is your obligation to inform all the attorneys for all the litigants that service was improper and ineffective.

It is your obligation to inform the District Attorney in all jurisdictions where Mr Sweeney served papers while fraudulently claiming to be a Constable in conscious violation of G.L.c. 268, § 33, and especially the City of Cambridge.

It is now clear that my decision to bring accountability under Chapter 93A to the actions of Mr Sweeney, a law passed specifically to punish and deter fraudulent and deceptive practices, was the proper procedure.

I am certain that you will agree, as licensed attorneys, that Mr Sweeney's action was consciously fraudulent and consciously deceptive and certainly one that you do not condone.

Despite your assertion yesterday that my 93A letter was frivolous, as you can see, it was not.

Please contact me at your earliest with a truly reasonable offer that includes the "triple damages" allowed for in egregious cases of criminal conduct such as this, an offer that does not qualify as an "insult" as described by the SJC in *Rhodes v. AIG Domestic Claims, et al.*, 461 Mass. 486 (2012).

Yours sincerely,

Bharani Padmanabhan MD PhD

Bharani Padmanabhan MD PhD

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